

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA, <i>ex rel.</i>)	
J. Douglas Strauser, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:18-cv-00673-GKF-SH
)	
STEPHEN L. LAFRANCE HOLDINGS,)	
INC. <i>et al.</i> ,)	
)	
Defendants.)	
)	

RELATOR’S MOTION TO FILE UNDER SEAL

COMES NOW, the Plaintiff-Relator, J. Douglas Strauser, and pursuant to LCvR79.1 of the Local Rules of the United States District Court for the Northern District of Oklahoma and the Agreed Protective Order (Dkt. 157) respectfully moves the Court to enter an Order permitting Relator to file under seal certain documents addressed in Relator’s Motion for Partial Summary Judgment (“MSJ”) (Dkt. 337), filed today. Thirteen exhibits to the MSJ, Exhibits 30-39 and 68-70, contain information designated Confidential by Defendants or third-parties pursuant to the Agreed Protective Order. Because of the sensitive and confidential nature of these documents, Relator requests this Court enter an Order permitting these specific Exhibits to be filed under seal. These documents generally consist of contracts and manuals between various USA Drug pharmacies and pharmacy benefit managers that administer federal prescription drug benefit programs including Medicare Part D and TRICARE. Relator understands that the full terms of the agreements are not public and therefore requests this Court enter an Order permitting his MSJ to be filed partially under seal. No redactions to the MSJ itself are necessary.

WHEREFORE, premises considered, Relator respectfully requests this Court enter an Order permitting Exhibits 30-39 and 68-70 to be filed under seal.

Dated: July 12, 2021

Respectfully Submitted,

/s/ Cory S. Buland

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CERTIFICATE OF SERVICE

This certifies that all counsel of record were served via the Electronic Case Filing (ECF) system on July 12, 2021.

/s/ Cory S. Buland
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